

## **SECTION 6**

### **DRAFT SECTION 4(f) EVALUATION**

#### **6.1 Introduction**

This section describes and evaluates impacts to properties protected by Section 4(f) of the Department of Transportation Act of 1966. The purpose of the Section 4(f) Evaluation is to ensure that, where there are adverse effects to protected resources, all prudent and feasible alternatives to use of such resources have been considered, that planning has included all possible measures to minimize harm, and that coordination with appropriate agencies has satisfactorily occurred.

The Federal Highway Administration (FHWA) has determined the project will result in adverse effects on the potentially historic properties noted below (see also Table 6-1):

- Dawley Residence / Stone Store
- Michigan Milk Producers Receiving Station
- Hawes House
- Freeman Sweers Residence / Louhelen Baha'i Center

A wider road, whether a boulevard, five-lane, or combination of the two, would adversely affect the settings of these properties. FHWA has consulted with the State Historic Preservation Officer (SHPO) to develop measures to minimize harm. Those measures are contained in the draft Memorandum of Agreement found in Appendix L. This draft Section 4(f) document was prepared for processing under the procedures set forth in FHWA regulation 23 CFR 771.135.

#### **6.2 Proposed Action and Need for Project**

Widening M-15 for 20 miles between I-75 and I-69 is proposed. This two-lane rural highway is becoming inadequate due to tremendous growth in Oakland County and significant, but lesser growth in Genesee County. The population of the five townships comprising the corridor grew 29 percent from 1990 to 2000. Traffic forecasts for 2025 indicate a need through the length of the corridor for four through travel lanes, with traffic volumes ranging between 18,400 and 35,200. As congestion increases there are fewer opportunities to pass and left turns to and from the 550 driveways along M-15 (400 are residential) become more and more difficult. Drivers must accept shorter gaps in traffic and wait longer. The result is poorer traffic service, decreasing safety, and a decreasing quality of life. The inability to get onto M-15 was noted at a number of the public meetings held for the project. With the project, the entire corridor will operate at a Level of Service C or better. For a more detailed discussion of the purpose and need for the project see Section 2 in the body of this Draft EIS.

#### **6.3 Description of Historic Resources**

The *National Register of Historic Places* has established criteria for determining historic significance. These criteria require a property to have integrity of location, design, setting,

materials, workmanship, feeling, and association. Additionally, the property must meet one of the following criteria: a) be associated with a significant event; b) be associated with the lives of significant persons; c) embody the distinctive characteristics of a type, period or method of construction, or represent the work of a master; or, d) have yielded or be likely to yield information important in history or prehistory (usually archaeological sites). A property must also be fifty years old or older to be considered *National Register* eligible. A discussion of properties considered eligible and expected to experience adverse effects with the project follows.

### **6.3.1 Ernest and Harriet Dawley Residence, 850 Ortonville Road (M-15), Ortonville**

Beginning in 1916, Ernest and Harriett Dawley began the construction of the distinctive stone clad residence at the corner of Ortonville Road and Wolf Road and construction continued over a period of ten years (Figure 61a). Once part of a larger farm, the house is clad with stones gathered from the property. Dawley, a well-known stock dealer and farmer in the area, also transported livestock and produce to Eastern Market in Detroit and operated a nearby slaughterhouse. The house played a role in the slaughterhouse operations, with meat hung on the front porch until it could be picked up by neighboring farmers. Another reminder of the Dawley's is the metal rings at the exterior basement door that were used to raise a still out of the basement so that the corn mash could be cooked outside, then lowered back down the steps.

Located east of the house along the road are a pair of fieldstone pillars that flank the narrow front walkway. Constructed at the same time as the house, the pillars create a formal entrance to the front door from Ortonville Road. Approximately 40 inches tall, the pillars have battered sides that terminate with a hipped concrete cap. They comprise an integral part of the property.

The original property now includes a number of small businesses along M-15. The house later served as a television repair shop, and from 1968 to 1995 as a family residence. The current owner converted it into an antiques store in 1995. Driveway access from M-15 has not been allowed. It is from the side street to the south of the house.

While stone clad buildings are common in the Clarkston and Ortonville areas, the Dawley house is the finest example of this construction method and embodies the distinctive characteristics of a type, period and method of construction. Therefore, it is considered eligible for inclusion on the NRHP under Criterion C, architectural significance.

### **6.3.2 Michigan Milk Producers Receiving Station, 126 N. Ortonville Road, Ortonville**

Constructed in 1947, this state-of-the-art receiving station (Figure 6-1b) was constructed to replace smaller stations located in Ortonville and Atlas. The new receiving station in Ortonville was, at the time, the second largest in the state.

The Michigan Milk Producers Receiving Plant, constructed by general contractor Karl B. Foster of Flint, Michigan, handled about 200,000 pounds of milk in an eight-hour period. Thoughtfully designed, the receiving station included a covered driveway where cans of milk shipped by the producers would arrive, then be moved by inbound and outbound power conveyors. To maintain production levels, the receiving station was equipped with a fully-automatic 60 horsepower oil-burning boiler to wash milk cans as well as provide heat and hot water for the building. Cooling of the milk was accomplished by passing it over a surface cooler, equipped with two eight-by-eight ammonia compressors, then storing it in three stainless steel 5,000 gallon cold wall tanks. Also included in the efficient design of the receiving station was a completely enclosed loading room to fill tank trucks with the processed milk.

Figure 6-1



1 **Fig. 6-1a Ernest and Harriett Dawley Residence, with Stone Pillars in Front Yard**



Fig. 6-1b Michigan Milk Producers Receiving Station, Ortonville



2 **Fig. 6-1c Henry Hawes Residence, Streetscape**



3 **Figure 6-1d Louhelen Farmhouse, ca. 1948**

The Art Moderne style of the Michigan Milk Producers Receiving Plant was popular from 1935 to 1950. Most commonly used for industrial designs, the Art Moderne style was representative of the general trend toward aerodynamics and industrial design. Typical features of the building style include curved corners, asymmetrical fenestration, smooth wall materials, including stucco or masonry wall surfaces, and a flat roof.

Although currently appearing to be vacant, the building is a well-preserved example of the small Art Moderne style industrial facilities. Linking the area's agricultural heritage to the requirements of contemporary living, the small facility was one of the largest milk receiving stations in Michigan. The former Michigan Milk Producers Receiving Station is directly associated with events (*National Register*, Criterion A) pertaining to the agricultural history of the area and embodies the distinctive characteristics of the Art Moderne style (Criterion C).

### **6.3.3 Henry Hawes Residence, 8083 State Road (M-15), Goodrich**

Located on the east side of State Road (M-15), the property currently consists of an Italianate style house erected ca. 1870 and a garage constructed ca. 1940 (Figure 6-1c). Around the house are several large trees, which were probably planted early in the history of the building and continue to provide both shade and privacy. The house, an example of the Front-Gabled Roof Italianate form, features a two-story main house with one-story elements extending from the north, east, and south facades. A distinctive cornice complete with brackets under the overhanging roof, two-over-two double-hung windows, and a polygonal bay window are among the extant features of the house. Although some alterations to the original building have occurred, including the construction of an enclosed porch at the southeast corner of the house in the early twentieth century and the cladding of the exterior walls with asphalt shingles, the building has retained a high level of its original integrity.

The first known owner of the house was Henry Hawes. In 1873, Hawes was listed in the Goodrich Business Notices as a "Manufacturer of all kinds of Agricultural Implements, Castings, Plows, &c., Main St." In addition to his work as a manufacturer, Hawes was a farmer, owning 30-acres of land associated with the house on State Road. Hawes died in 1917. Little additional information is available on Hawes, who apparently drew most of his clientele from the Goodrich area. The land associated with Henry Hawes remained in the Hawes family into the 1940s when it was subdivided into Hawes Subdivision.

Although there have been a number of changes to the house, it still retains its distinctive appearance as an Italianate-style building. The only known example of the Italianate style in Goodrich and the surrounding area, the house is considered to be eligible for inclusion on the NRHP under Criterion C which requires the building embody the distinctive characteristics of a type, period, or method of construction. The small garage is considered a contributing resource to the potential Henry Hawes Residence Historic District. Constructed in years after Mr. Hawes' death by his descendants, the garage represents the practice of constructing buildings to store the family automobile. Once a small farm, none of the early outbuildings, which could have served the same purpose, have survived.

### **6.3.4 Fredrick Sweers Farm/Louhelen Baháí School, 8203 State Road**

Established some time between 1873 and 1889, the original farm was owned and operated by Freeman Sweers and his wife Elizabeth Seelye Sweers. Sweers was one of 12 children by Atlas Township pioneers Manly and Lydia Sweers. Although several of the Sweers family children

carried out important roles in their communities, including brother Milo who served as the deputy sheriff of Genesee County and Lewis, who was the president of a bank in Ortonville, Freeman appears to have made his life work his 120-acre farm. The farm remained under the ownership of Freeman Sweers into the twentieth century, but by the 1930s had been sold to D.P. Hall. By 1930, the farm in deteriorated condition, was purchased by Lou and Helen Eggleston.

Although farming was part of the plan for the property, the Egglestons wanted to develop a property that could be self-supporting and become the basis for establishing a Bahá'í school. Two other such schools existed at the time, but no similar operation was located anywhere in the central United States.

The first classes at Louhelen (named for owners, Lou and Helen) were an informal nine-day session in the summer of 1931. Most who joined the first session were already Bahá'ís, although at least one member from the community, a clergyman from nearby was also among those who attended. The school continued to grow over the next few years, requiring the construction of additional lodging in the form of small cabins and dormitories. Dining porches were added, the kitchen enlarged, and washrooms erected during the following years to accommodate the growing popularity of the school (Figure 6-1d). In less than 20 years, the school had achieved an international reputation, with students attending from as far away as the Philippines and Latin America.

In 1948, Helen and Lou Eggleston legally transferred ownership of the Louhelen Bahá'í School to the trustees of the National Spiritual Assembly. Today, Louhelen continues to provide a year-round program that serves nearly 20,000 people annually in a wide range of spiritual education and community service programs.

Currently the Louhelen property includes the original farmhouse (ca. 1880), The Refuge originally constructed as the campus library in 1939; the Gym and Unity House (ca. 1930); the Maintenance Barn (ca. 1900); the new main building including offices, classrooms and lodging (1980s); several small storage sheds erected in the 1980s; and, four staff residences, the earliest dating from the 1950s, and three more recently constructed in the 1990s. Extensive changes were made to the original farmhouse to accommodate the growing needs of Louhelen in the 1930s and 1940s. These alterations, have since been reversed following a decision in the early 1980s to restore the farmhouse to its 1930s-appearance.

Louhelen Bahá'í School is considered eligible for inclusion on the NRHP under Criterion A. The former farm has slowly evolved into an internationally recognized center for religious instruction and growth in the Bahá'í Faith. One of the first three such centers in the United States at the time of its development in 1931, Louhelen was the first school established in the central portion of the country. Additionally, the farmhouse is considered eligible for inclusion on the NRHP under Criterion C. Constructed in the Italianate style, the Bahá'í community has faithfully restored the house to its original appearance, preserving an important connection to the farming community that provided the foundation for the school.

## **6.4 Impacts on the Section 4(f) Properties**

The properties discussed above are expected to experience adverse effects with the project. The properties and potential adverse effects are summarized in Table 6-1.

Changes in noise levels are not significant. Traffic levels will rise with or without the project. As it takes a doubling of traffic to produce a perceptible noise level increase, the variation in noise levels between the proposed project and taking no action is small. Where the traffic is shifted closer to a receptor there is a potential for impacts, but a similar principle applies. Traffic must be half as close for a perceptible increase in noise. Only at the Michigan Milk Producers Receiving Station would a change be potentially perceptible (see below).

**Table 6-1**  
**Potential National Register Eligible Cultural Resources – Adverse Effects**

Site Name	Location	Description	Eligibility Criteria	Effect
Dawley Residence / Stone Store	850 Ortonville West side M-15 north of Wolfe Road	Former residence, now gift shop with stone pillars in existing right-of-way, circa 1916	C	New right-of-way would be about 40' into yard for wider road.
Michigan Milk Producers Receiving Station	126 N Ortonville Road. East side M-15 N of Myron Street	Example of small Art Moderne style industrial facility	A & C	New right-of-way line would be about 10' from building.
Henry Hawes Residence Historic District	8083 State Street on East side M-15 in Goodrich	Italianate architectural example, circa 1870.	A & C	New right-of-way would be about 30' into front yard, including two large trees.
Freeman Sweers Residence / Louhelen Baha'i Center	3208 State Road. West side M-15 north of Bristol Road	House circa 1885. Retreat founded in 1931 as Baha'i faith school and center	A & C	Existing right-of-way line maintained, but trees may be removed.
200K480	East side M-15 south of Oak Hill Road	Archaeological remains of farmstead	Unknown	Phase II testing required to determine National Register eligibility. New right-of-way would extend over much of site.

Source: Commonwealth Cultural Resources Group

At the Dawley Residence / Stone Store the two entrance pillars are near the existing right-of-way line. The preferred narrow boulevard section (with its 172-foot right-of-way, compared to 120 feet of right-of-way for a five-lane sections) would remove these stone pillars and encroach on about 40 feet of yard. This is considered an adverse effect because it would alter the property's setting.

The narrow boulevard section would carry north past the Michigan Milk Producers Receiving Station, with the new right-of-way passing very close to the building - on the order of ten feet. The Ortonville Cemetery on the other side of the road forces road widening to the Milk Producers Station side of the road. The extensive intrusion into the Receiving Station yard is considered an adverse effect. Due to the close proximity of the future road pavement relative to the existing road, this is the sole location where a perceptible noise increase is expected. The future noise level with the project could be 3 decibels higher than if the road improvements were not made. Three decibels is typically the minimum noise level increase that can be detected outside of laboratory conditions. Despite this increase, the projected noise level with the project would be 66 decibels, well within the applicable criterion for commercial uses of 71 decibels. The wider roadway would also change the setting. The view from the south is obscured by vegetation on a

vacant lot that would be acquired. Also, the commercial uses to the south would be acquired and removed. The result would be greater visibility for the Milk Producers Station.

The Hawes House, on the east side of M-15 in Goodrich, would experience a 27-foot encroachment resulting from extending the road's right-of-way limit to the east, while maintaining the west right-of-way line in its present position to avoid impacts to 20+ residences with very minimal setbacks on that side of the road. Two large mature evergreen trees are located at the proposed right-of-way limit in the front yard of the Hawes House. Given that most of the proposed right-of-way expansion will be pavement, it is uncertain whether the trees would survive construction. The trees are of an age that they were likely planted as yard trees for the Hawes House. The encroachment into the yard and the likelihood that the yard trees will be taken are considered to result in an adverse effect on the Hawes House, due to the change in setting.

The Freeman Sweers Residence / Louhelen Bahá'í Center includes a line of evergreen trees that appear to be in the existing right-of-way (along the south section of the property abutting M-15). These trees were probably not extant at the time of the founding of the Louhelen Center, but may have been planted to screen the Center from the road. It is uncertain whether these trees could be preserved because of the need for drainage improvements associated with widening M-15. Because of the likelihood of the removal of the trees, the effect of the proposed project on the Center is considered adverse.

## **6.5 Avoidance Alternatives**

Build alternatives were considered, as well as the Transportation System Management (TSM), Mass Transit, and No Action alternatives. The build alternatives considered paving other roads to divert traffic from M-15, building bypasses at key locations, and widening M-15 in various ways. The development of alternatives and their evaluation are discussed in Technical Reports 1, 2, and 3 for the project and in Section 3 of the EIS.

The TSM, Mass Transit, and build bypass alternatives do not meet the project need. In each case travel modeling found a need for four through travel lanes. Consideration of a standard boulevard section found the impacts, including impacts to historic resources, could be lessened with a narrower cross section, a "narrow" boulevard, without compromising traffic flow and safety. Therefore, the wider, standard boulevard was dropped from consideration, and narrower typical sections were considered. This step was specifically taken to develop avoidance alternatives.

The No Action Alternative does not meet the need for the project for four through travel lanes. Public comments received at meetings and in correspondence and email indicated some believed that if growth were stopped, the project would not be necessary, at least in the Goodrich/Atlas Township area. Because of this sentiment, alternative land use scenarios were examined. One scenario shifted growth from that projected locally, moving it from Oakland County north along M-15 towards I-69. Another reduced the expected growth in Atlas Township by 75 percent. Even under these alternative "No Action" land use scenarios computer modeling showed a need for four through lanes throughout the project length.

Even after the standard-width boulevard was dropped from further consideration, the build alternatives were designed to avoid effects on Section 106 properties. Potential historic resources were identified early in the analysis process. Those that were deemed to have some potential for the *National Register* were avoided, where prudent and feasible. These properties, together with



wetlands acted as design layout “controls.” Avoidance and then minimization guided the development of the alternatives.

## **6.6 Measures to Minimize Harm**

The alternatives that survived the practical alternatives stage to comprise the preferred alternative were a five-lane typical section and a narrow boulevard. The five-lane section fits in a 120-foot right-of-way and the narrow boulevard fits in a 172-foot right-of-way. The boulevard was favored where its construction appeared prudent and feasible due to its greater safety. The five-lane alternative had the advantage of a smaller footprint. As the project evolved, a third cross section was developed to minimize impacts. The “very narrow boulevard” was suggested as an alternative to the five-lane section where access needs were minimal, such as where M-15 passes between two wetlands, or next to some historic resources. With no driveways, there is no need for a center turn lane or substantial median width (to accommodate U-turns) and the very narrow boulevard can meet the traffic and safety needs.

In the end, a mix of five-lane, narrow boulevard and very narrow boulevard sections was used to avoid as many of the historic resource (and wetlands) as was practicable. The proposed action has minimized right-of-way impacts in recognition of historic resources. Comments related to specific properties follow.

At the Dawley Residence / Stone Store yard area and the stone entry pillars would be acquired. There was a very strong feeling on the part of citizens at meetings and the leadership of Ortonville and Brandon Township to maximize the extent of boulevard section in the vicinity of Ortonville. The boulevard is desired for safety reasons because of the presence of the Brandon elementary, middle, intermediate and high schools in the area, and the resultant auto and pedestrian activity. At the same time the Stone Store has not been permitted to have driveway access from M-15. The owner would prefer to have the stone pillars moved to the entrance off of the “side” road (Wolfe Road). This is the area where pedestrian traffic now approaches the residence (now store). Another influence on the location of the proposed road (the centerline would be maintained in approximately its present location) is the presence of wetlands associated with Duck Creek. Shifting the road to the east to avoid the Stone Store would take more of the wetland area bordering the Brandon Middle School.

Because of the presence of the Ortonville Cemetery and its *National Register* potential section, the minimization option at the Michigan Milk Producers Receiving Station was limited. Safety remained a concern in the Ortonville area and so the boulevard section was perpetuated in this area. Minimization of harm would occur through landscaping. The greater visibility of the property from the south may change its viability as a commercial property.

A minimal cross section, based on safety standards has been proposed through Goodrich, where the Henry Hawes Residence Historic District is located. Measures to minimize harm in this case could take the form of replacing the yard trees, matching the evergreen species planted originally.

At the Freeman Sweers Residence / Louhelen Bahai’ Center – the row of evergreens along the south portion of the property would likely be taken. The minimal typical section (5-lane) is proposed in this section, and so a narrower cross section is not considered prudent. New right-of-way acquisition necessary in this section is proposed for the east side of the road, so avoidance has already been taken into account. The minimization of harm proposed at the Bahai’ Center is



the replacement of the row of evergreen trees at the right-of-way edge, if the existing trees cannot be preserved.

A number of general measures apply to all sites. Prior to construction MDOT will establish a permanent record of the history and current conditions of sites determined to be eligible for the National Register of Historic Places in conjunction with the SHPO. This consultation will also guide the appropriate level of detail of the documentation. MDOT will provide original copies of the documentation with photos to the SHPO and appropriate local archives designated by the SHPO.

MDOT will ensure that properties identified in consultation with the SHPO are landscaped in accordance with a landscape plan designed in conjunction with the SHPO and property owners. MDOT will retain an historian meeting the Secretary of the Interior's "Professional Qualifications Standards" (48 FR 44738-9) and trained in historic landscape analysis and design to assist in plan development.

## **6.7 Coordination**

Effects of the proposed action, the alternatives considered, and the proposed measures to minimize harm will be reviewed by and developed in consultation with the SHPO, the public, and the property owners (almost all of whom have been contacted in the course of the analysis). FHWA will provide information to the Advisory Council on Historic Preservation for their review and comment. MDOT has conducted extensive owner interviews to complete the historic property inventory and held the following meetings, to which the public was invited:

- November 15, 2000 – Meeting devoted to historic resources, both to inform citizens about process, make them aware of known resources and solicit their comments. Brandon Township "Old Town Hall." (Total attendance 34.)
- January 24, 2001 – Workshop/Open house display of information on the practical alternatives and to discuss historic resources. Lakeview Community Church. (Total attendance 229.)
- April 3 & 4, 2001 - Presentation of the results of the evaluation of the practical alternatives and to discuss impacts to historic resources. Brandon Township Middle School and Goodrich High School Cafetorium. (Total attendance 350.)

As part of the National Environmental Policy Act public involvement process, MDOT will continue to seek input concerning potential impacts and mitigation choices.

A public hearing will be held after publication and distribution of this Draft EIS / Draft Section 4(f) Evaluation. This document is being distributed to the appropriate federal, state, and local agencies, and will be made available for public review and comment.